

# THE BERKMAN LAW OFFICE, LLC

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March 10, 2023

**BY ECF**

Hon. Paul G. Gardephe  
United States District Judge  
United States District Court for the Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Rachel Bell v. JPMorgan Chase Bank, N.A., and Jones Lang LaSalle Americas, Inc.*  
Case no. 20-cv-02468(PGG)(slc)

Dear Judge Gardephe,

This firm represents Plaintiff in the action referenced above. This letter is respectfully submitted to convey a joint request of the parties.

The pre-trial order is due today, March 10. The parties have been working together to prepare it and will be ready to submit it today. However, we are not quite ready with the ancillary materials, e.g. proposed voir dire, jury charges, verdict sheet, trial memorandum, and trial notebooks. The parties jointly respectfully request an extension until Thursday March 16 to submit those materials.

The parties thank the Court for its consideration of this request.

Respectfully yours,


  
Robert J. Tolchin

cc. All counsel of record by ECF

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
**Paul G. Gardephe, U.S.D.J.**  
Dated: March 10, 2023